

Exhibit 4



McGuireWoods LLP
888 16th St. N.W., Suite 500
Washington, DC 20006
Phone: 202.857.1700
www.mcguirewoods.com

Michael Francisco
Direct: 202.857.1722
mfrancisco@mcguirewoods.com

January 26, 2024

Maya M. Eckstein
Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219
meckstein@HuntonAK.com

Re: Baby Doe et al. v. Joshua Mast et al., Case No. 3:22-cv-49-NKM

Ms. Eckstein and all defense counsel,

We request you immediately delete the documents stamped with bates numbers J&SMASST-WDVA-00772 through J&SMASST-WDVA00798, which were inadvertently produced to Plaintiffs. These documents are protected by the work product doctrine.

Pursuant to Section (D)(2) of the signed Proposed Discovery Plan dated December 27, 2022 (ECF No. 129), please cease inspection of these documents and, within five days of receipt of this letter, return or destroy all copies of these documents, including electronic versions, instruct any persons to whom these documents have been conveyed to do the same, and ensure there is no further use or disclosure of these documents.

Defendants will include these documents in their privilege log, which will be provided at a later date.

Thank you for your prompt attention to this matter.

Cordially,

/s/_____

Michael Francisco